

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re Flint Water Cases

Case No: 5:16-10444

Judith E. Levy

United States District Judge

**LAN DEFENDANTS' DISCLOSURE PURSUANT TO DISCOVERY
COORDINATION PROTOCOL ORDER (Dkt. 566) SECTION IV. E**

NOW COME Lockwood, Andrews & Newnam, Inc., Lockwood, Andrews & Newnam, P.C., and Leo A. Daly Company (the "LAN Defendants") and provide the following information pursuant to the Discovery Coordination Protocol Order (Dkt. 566) entered on August 17, 2018:

1. The LAN Defendants have taken or participated in only one deposition in proceedings falling within the definitions of Federal Flint Water Cases or State Flint Water Cases contained in the Discovery Coordination Protocol Order. The jurisdictional only deposition of Edward Benes was taken by counsel for Plaintiffs on January 10, 2018, at the offices of Drinker, Biddle & Reath in Dallas, Texas following Notice to counsel in both the Federal and State Flint Water cases.

2. The LAN Defendants have not yet served an interrogatories or requests for production of documents in any action falling within the

definitions of Federal Flint Water Cases or State Flint Water Cases contained in the Discovery Coordination Protocol Order.

3. The LAN Defendants have participated with other parties in the service of four documents-only subpoenas in In re Flint Water Cases, Civil Action No. 5:16-cv-10444-JEL-MKM. No documents responsive to those subpoenas have yet been received by the LAN Defendants.

Respectfully submitted,

/s/ Wayne B. Mason

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CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2018, I electronically filed LAN Defendants' Disclosure Pursuant to Discovery Coordination Protocol Order

(Dkt. 566) Section IV. E with the Clerk of the Court using the ECF system
which will send notification of such filing to all attorneys of record.

By: /s/ Philip A. Erickson
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